

Appendix A

Responses to Singular's Claims Regarding Relevance of Google's Supplemental Production

Singular Claim	Responses
<p>1. [REDACTED]</p> <p>Mot. at 1.</p>	<ul style="list-style-type: none"> The slide that [REDACTED] For example, there is no mention of the number of LPHDR units in the device exceeding the number of single-precision execution units, let alone exceeding that number by at least 100, which is a key limitation of the asserted claims. <p>Citations: Compare Ex. 1, GOOG-SING-00242366 [REDACTED]¹ with Ex. 2 (“273 Patent”) claim 53 and Ex. 3 (“156 Patent”) claim 7.</p> <ul style="list-style-type: none"> Google previously produced a [REDACTED] <p>[REDACTED]</p> <p>Citations: Ex. 4, [REDACTED]; Ex. 5 ([REDACTED]) at 212:19-215:18.</p>

¹ All exhibits referenced in this Appendix are attached to the Appendix itself for ease of reference; the truth and accuracy of the exhibits is verified in the accompanying Declaration of Christopher Sun in support of Google's Opposition ("Sun Decl.").

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	<ul style="list-style-type: none"> Google previously produced a [REDACTED] [REDACTED] <p>Citations: Ex. 6, [REDACTED] [REDACTED] Ex. 5 ([REDACTED]) at 204:22-207:8.</p> <ul style="list-style-type: none"> [REDACTED] [REDACTED] Google produced this [REDACTED] [REDACTED] <p>Citations: Ex. 7, [REDACTED] [REDACTED]; Ex. 8 ([REDACTED]) at 5:22-6:4, 6:19-23, 7:23-8:18, 130:22-146:9.</p> <ul style="list-style-type: none"> The fact that [REDACTED] [REDACTED] [REDACTED] s not notable. [REDACTED] [REDACTED] something Singular was obviously already aware of

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	<p>and that it has already addressed in discovery.</p> <p>Citations: <i>See, e.g.</i>, Ex. 9 (GOOG-SING-00242320); Ex. 5 ([REDACTED]) at 141:1-143:1.</p> <ul style="list-style-type: none"> • [REDACTED] <p>Citation: Ex. 21 (GOOG-SING-00242356).</p>
<p>2. The [REDACTED]</p> <p>[REDACTED]</p> <p>Mot. at 1.</p>	<ul style="list-style-type: none"> • [REDACTED] <p>Citation: Ex. 10 ([REDACTED]) at 11:7-15.</p> <ul style="list-style-type: none"> • [REDACTED] <p>And as noted above, Google previously produced documents regarding [REDACTED]</p> <p>[REDACTED]</p> <p>Citations: Ex. 11 ([REDACTED]) at 129:2-13 and 137:8-16; Ex. 8 ([REDACTED]) at 5:22-6:4, 6:19-23, 7:23-8:18, 130:22-146:9.</p>

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	<ul style="list-style-type: none"> As the Court noted—and as confirmed by the [REDACTED] these events occurred almost a decade ago, and the related individuals already testified about [REDACTED]
<p>3. The supplemental production includes an [REDACTED] Mot. at 1-2.</p>	<ul style="list-style-type: none"> This email refers to a summary of information from a [REDACTED]. Citations: Ex. 12 (GOOG-SING-00242405); Ex. 13 ([REDACTED]) at 80:4-13. [REDACTED] does <i>not</i> refer to the [REDACTED] Citation: Ex. 14 ([REDACTED]) at 75:10-15. Google previously produced [REDACTED]

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	<p>Citations: Ex. 15 (GOOG-SING-00208998), Ex. 2 to [REDACTED]; Ex. 13 ([REDACTED]) at 29:3-33:15.</p> <ul style="list-style-type: none">• The [REDACTED] does not contain a substantive discussion of [REDACTED]. It simply reflects that [REDACTED] <p>Citation: Ex. 12 (GOOG-SING-00242405).</p> <ul style="list-style-type: none">• The [REDACTED] also refers to [REDACTED]. <p>Citation: Ex. 10 ([REDACTED]) at 9:5; 14:21-15:15.</p>

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<p>4. The supplemental production includes [REDACTED]</p>	<ul style="list-style-type: none"> <p>This [REDACTED]. Those concerns have nothing to do with Singular's patent infringement claims.</p> <p>Citation: Ex. 16, GOOG-SING-00242382 [REDACTED].</p> <p>[REDACTED]</p> <p>Citation: Ex. 17 (GOOG-SING-00242381).</p> <p>[REDACTED] Dr. Bates and Singular have known about this contact since then and could have sought further information about it during discovery.</p> <p>Citations: Ex. 18 (SINGULAR-00027005); Ex. 19 (SINGULAR-00027138); Ex. 20 (SINGULAR-00027266).</p>
<p>5. [REDACTED] Mot. at 3.</p>	<ul style="list-style-type: none"> <p>[REDACTED] This is a patent-infringement case; there are no trade-secret or copyright claims. Direct patent infringement, as Singular alleges here, turns only on whether the accused product satisfies each limitation of the claim.</p> <p>Citation: American Intellectual Property Law Association Model Patent Jury</p>

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	<p>Instructions (2020) § 3 (relating to infringement), including § 3.1 (“Direct Infringement—Knowledge of the Patent and Intent to Infringe are Immaterial”).</p> <ul style="list-style-type: none"> Moreover, as [REDACTED] <p>Citation: Ex. 5 ([REDACTED]) at 14:13-23.</p> <ul style="list-style-type: none"> Google previously produced [REDACTED] revealed the lack of any relevance regarding these topics. <p>Citations: Ex. 5 ([REDACTED]) at 40:9-11; 135:24-155:1; 218:1-222:20.</p>
<p>6. The supplemental production includes [REDACTED] Mot. at 4.</p>	<ul style="list-style-type: none"> These emails are also not relevant. As noted above, [REDACTED] is irrelevant to whether Google infringes Singular’s patents. Indeed, [REDACTED] before any of the asserted patents issued. <p>Citation: Ex. 2, U.S. Patent No. 8,407,273 (issued Mar. 26, 2013).</p> <ul style="list-style-type: none"> Dr. Bates also made the information in the circulated presentation widely available.

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	<p>He posted a similar presentation to his public website [REDACTED]</p> <p>Citations: <i>See, e.g.,</i> Ex. 9 (GOOG-SING-00242320); Ex. 5 ([REDACTED]) at 141:1-143:1.</p> <ul style="list-style-type: none"> As discussed elsewhere herein, there has already been extensive discovery, including document production and deposition questioning, surrounding [REDACTED]
<p>7. [REDACTED] Mot. at 5-6.</p>	<p>As noted above:</p> <ul style="list-style-type: none"> This [REDACTED] One of the [REDACTED] <i>See supra</i> pg. 3 (discussing [REDACTED]). While [REDACTED] Google previously produced documents [REDACTED]. <i>See supra</i> pgs. 2-3.
<p>8. [REDACTED]</p>	<ul style="list-style-type: none"> [REDACTED] familiarity or lack of familiarity with Dr. Bates is irrelevant. There is already extensive discovery,

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<p>[REDACTED] Mot. at 6.</p>	<p>including document production and deposition testimony, concerning [REDACTED]</p> <p>[REDACTED] See <i>supra</i> pgs. 2-3.</p> <ul style="list-style-type: none"> • That [REDACTED] <p>[REDACTED] Ex. 11 ([REDACTED]) at 137:17-20.</p>
<p>9. [REDACTED] Mot. at 8.</p>	<p>See Claim 3 above.</p>
<p>10. [REDACTED] Mot. at 15.</p>	<p>See Claim 2 above.</p>

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed

Nathan R. Speed